

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG, PUSHUN
CHENG, CHANGZHEN NI, JUNFANG YU,
MEIXIANG CHENG, FANGSHOU YU, and
CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL SERVICES
COMPANY, HEWLETT-PACKARD
FINANCIAL SERVICES (INDIA) PRIVATE
LIMITED, HP INC., HEWLETT PACKARD
ENTERPRISE COMPANY, and DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

DEFENDANTS' MOTION TO IMPOUND EXHIBITS TO STATUS REPORT

Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett-Packard Enterprise Company, and David Gill (collectively, “Defendants”) hereby move, pursuant to Local Rule 7.2, that the Court impound certain exhibits attached to Defendants’ Status Report until further order of the Court. Grounds for this motion are as follows:

1. It is necessary for Defendants to attach several exhibits to the Declaration of Paul Saso accompanying Defendants’ Status Report. Certain of these exhibits are documents designated by Plaintiffs as “CONFIDENTIAL” under the Joint Stipulated Protective Order (“Protective Order”) entered in this case (Dkt. No. 186).

2. The Protective Order mandates that all materials designated as “CONFIDENTIAL” shall be filed under seal. Dkt. No. 186, ¶ 9.

WHEREFORE, in an effort to comply with their obligations under the Protective Order, Defendants respectfully request that certain designated exhibits to Defendants' Status Report be impounded until further order of the Court. Upon termination of the impoundment period, outside counsel for Defendants will retrieve and take custody of the impounded materials.

Dated: August 15, 2019

GIBBONS P.C.
One Pennsylvania Plaza, 37th Floor
New York, New York, 10119
(212) 613-2000

CHOATE, HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
(617) 248-4000
Attorneys for Defendants

By: /s/ Christina T. Lau _____
Christina T. Lau

CERTIFICATE OF SERVICE

I, Christina T. Lau, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing Motion to Impound Exhibits to Status Report was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on August 15, 2019.

/s/ Christina T. Lau _____
Christina T. Lau